INTERPRETIVE GUIDANCE DOCUMENT (IGD)

Environmental, Safety and Occupational Health Management System Defense National Stockpile Center

Table 5a

Implementation Strategy for Goals and Objectives

Version: 7/22/03

Item No	Activity	Measurable Objective	Corresponding Targets	Implementation Plan Action Items	Cognizant Personnel	Projected Period for Implementation	Date of Initiation	Date of Completion	Program Area
1.	Outloading commodity piles	Removal of all manganese ore from Three Kids Mine site.	Final area cleanup in all removals	Conduct a final cleaning/sampling of the storage area in compliance with NDEP's regulations.	Clearfield, UT Facilities Distribution Manager	August 20, 2003	August 20, 2003	November 20, 2003	Outloading commodity piles
2.	Outloading commodity piles to transit/trucks	Mitigation of dust generation	Fugitive dust less than OSHA standard	For commodities that generate dust, wet the commodity during the outloading process	Facilities Distribution Manager	August 20, 2003	August 20, 2003	November 20, 2003	Respiratory, Outloading commodity piles
			Coordination with Regulatory Agencies	Confirm receipt of appropriate data/ documentation with state regulators to ensure permit requirements are met.	DNSC-E	August 20, 2003	August 20, 2003	November 20, 2003	Outloading commodity piles, Respiratory
			Best management practices (BMP)	Apply potential BMPs at site and select appropriate options and implement.	DNSC-E	Prior to initiation of project (August 20, 2003)	August 20, 2003	November 20, 2003	Stormwater, Respiratory
		Apply EPA Phase II BMPs to all DNSC storage sites	Develop site-specific storm water management plans	Identify BMPs for each Depot and incorporate into Depot storm water management plan	Parsons	September 1, 2003	September 2002	February 2004	Stormwater

CAUTION

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	Outloading commodity piles to transit/trucks (Cont'd.)	Storage pad/area meets applicable cleanup standard	Plan for site investigation & remedial action as appropriate	Studies and remedial actions are scheduled and executed after area is cleared of commodities	DNSC-E	August 1, 2003	August 1, 2003	See Environment al Cleanup Schedule and Budget Document	Stormwater, Storage Operations
3.	Mercury Storage		All vapor measurements are within DNSC exposure level of 25,000ng Hg/cubic meter	Monthly mercury inspections or as noted in Mercury Inspection Plan	DNSC-E	May 2002	May 2002	June 2004	Storage Operations
4.	Lead Storage	Fugitive dust does not exceed action level	No exposure to employees due to PPE	Respiratory Protection Plan at Warren, OH	DNSC-E	Prior to outloading	To be Scheduled	To be Scheduled	Respiratory
5.	Thorium nitrate Storage	Emission do not exceed action level	Employee exposure less than allowable dose	Radiation Protection Plan	DNSC-E	May 2002	April 2003	June 2005	Radiation
6.	Material Handling	No material spills per year	Zero reportable spills	Training and following operation procedure	Facilities Distribution Manager	January 2003	January 2003	January 2004	Storage Operations
7.	Room Lighting	Disposal of spent fluorescent bulbs	Zero bulbs thrown in refuse	Standard operating procedure to Depots for proper disposal of bulbs	Facilities Distribution Manager	February 15, 1995	February 15, 1995	June 2004	Pollution Prevention

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8.	Office Activities	30% Compliance with DNSC Ergonomics Plan (Phase I)	Procure ergonomically- correct equipment for 30% of staff as Phase I implementation of Plan.	Ergonomics Plan	DNSC-E	Fiscal Year 2004	October 2003	September 2004	Ergonomics